

LANKLER SIFFERT & WOHL LLP

ATTORNEYS AT LAW

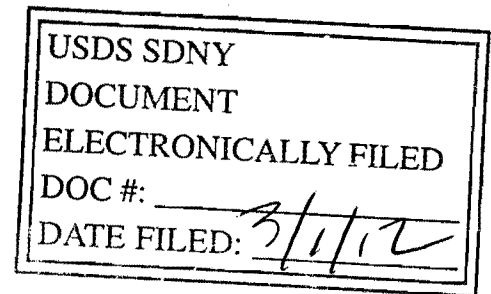
33RD FLOOR
500 FIFTH AVENUE
NEW YORK, N. Y. 10110-3398
WWW.LSWLAW.COM

TELEPHONE (212) 921-8399
TELEFAX (212) 764-3701

February 27, 2012

BY HAND

Honorable Harold Baer, Jr.
United States District Judge
United States District Court
for the Southern District of New York
500 Pearl Street
New York, New York 10007



Re: *United States v. Goldberg, et al.*, 10 Cr. 654 (HB)

Dear Judge Baer:

Pursuant to the Court's January 5, 2012 scheduling Order and the parties' agreement, the parties have exchanged motions *in limine*. Defendant Steven Goldberg's memoranda of law in support of his motions *in limine* and exhibits include information subject to the Court's Protective Orders, dated August 19 and December 6, 2010. Because the filing of our memoranda of law and exhibits will necessarily disclose protected information to the public and the media, we respectfully request permission to file our memoranda of law and exhibits, and our papers in response to the government's motions *in limine* (due March 12, 2012), under seal. Courtesy copies of the seven memoranda of law and exhibits are enclosed.

The Government has informed me that it consents to this request.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "D. Gitner".

Daniel M. Gitner

So Ordered:

A handwritten signature in black ink, appearing to read "Harold Baer, Jr.", with the date "3/1/12" written next to it.

Hon. Harold Baer, Jr.
United States District Judge